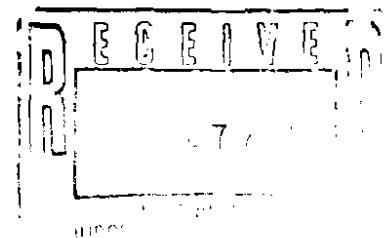


USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/27/07

LAW OFFICES
OF
BRUNO C. BIER, ESQ.

38 West 32nd Street, Suite 1603
New York, New York 10001
Tel: (212) 481-4900
Fax: (212) 481-9227



By Facsimile

July 27, 2007

The Honorable Robert P. Patterson
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Lokesh Bhat - 07 cr. 348 (RPP)
Request For An Extension Of Date For Defense Motions

Your Honor:

I am the attorney for Lokesh Bhat in the above-referenced case. I am respectfully requesting an extension of the date set for defense motions. The current date set for defense motions is July 30, 2007, and I am seeking an extension of three weeks until August 17, 2007. I am making this request because the government, as part of their discovery obligations, provided me with surveillance tapes on 31 DVD and CD discs. I am still in the process of reviewing the discs, and the review is taking a significant amount of time.

I have contacted opposing counsel, AUSA Sharon E. Fraise, and she does not oppose this request. This is my first request before this Court for an adjournment in this matter. If the Court grants my request, the government's response to any motions should be rescheduled for September 3, 2007, which is three weeks from the current date set for their response, and the date for the Court's decision should be rescheduled for September 6, 2007, or for whichever date is most convenient for the Court. I understand that the time period until September 6, 2007, or whatever other date the Court sets for its decision, would be excludable. Thank you for your

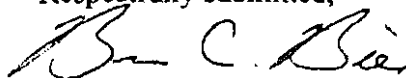
*Application Granted
So order
R. P. Patterson
USDC
7/27/07*

Letter Request For Extension USA v. Lokesh Bhat – 07-cr-348 (RPP)

July 27, 2007 -- 2

consideration of this request.

Respectfully submitted,



Bruno C. Bier, Esq.

BB-1633

38 West 32nd Street, Suite 1603

New York, New York 10001

t: (212) 481-4900

f: (212) 481-9227

bruno_bier@yahoo.com

cc: AUSA Sharon E. Fraise (By Facsimile)